

REMARKS

Claims 1-30 are pending in the present patent application. Claims 1-30 stand rejected. This application continues to include claims 1-30.

The Examiner rejected claims 1-30 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,156,541 (Babb). Applicant respectfully disagrees.

Babb is directed to an interconnected lock assembly having simultaneously actuated, multiple deadbolts. Unfortunately, Babb uses common element numbers to refer to different components. For example, Babb references mounting plate 72 (Figs. 1B, 4, 7 and 8; column 3, line 44) and springs 72 (Figs. 1C, 7; column 3, line 45). Babb references link slide 74 (Fig. 1B; column 4, line 45) and spring guides 74 (Fig. 7, 8; column 4, line 7). To add to the confusion, Babb identifies spring guides 74 (Fig. 7, 8; column 4, line 7) and spring guides 75 (Fig. 1C; column 3, line 45). Such inconsistent use of element numbers creates confusion and uncertainty, and yet the Examiner references mounting plate 72, compression spring 72, spring engaging surface 74 and spring retention chamber 75. Clarification is requested as to whether the Examiner's reference to "spring engaging surface 74" is with respect to link slide 74 or spring guides 74. Also, clarification is requested with respect to how Babb's spring guides 74 differ from Babb's spring guides 75, which appear to refer to the same spring guides.

Notwithstanding the above, it is important to note that the section view of Babb Fig. 7 taken along plane VII-VII of Fig. 3 shows a section through a central portion of spring guides 74, and clearly shows that spring guides 74 totally surround springs 72 in that region, and shows that the spring guides 74 surrounding springs 72 are in direct contact with mounting

plate (72). Slide plate 70 is also shown. Referring now to Fig. 3, it is clear that slide plate 70 is positioned between the two horizontally spaced and vertically extending spring guides 74.

Babb Fig. 8 taken along plane VIII-VIII of Fig. 3 shows a section through an extreme top portion of spring guides 74, but passing through an upper region of slide plate 70 between slide shoulders 70a and horizontal flanges 70d (see Fig. 1B and Fig. 3). Thus, no part of slide plate 70 is used in retaining springs 72 from lateral motion, and no part of slide plate 70 defines a spring retention wall which in conjunction with the mounting plate (72) defines a spring retention chamber.

It is further worth noting that Babb discloses at column 4, lines 4-7 that, "Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a and their lower ends abutting against the closed lower ends of spring guides 74." Accordingly, spring guides 74 are clearly separate from slide plate 70 so as to provide the intended biasing effect. In addition, it is clear that slide shoulders 70a of slide plate 70 facilitate vertical containment of the associated springs in conjunction with the closed lower ends of spring guides 74, but do not provide any lateral containment.

Turning now to Applicant's claims, claim 1 is directed to an interconnected chassis for a lock set. Claim 1 recites, among other things, "a slide plate having a spring retention wall and a spring engaging surface, ... and a spring retention chamber established between said spring retention wall of said slide plate and said mounting plate, said spring retention chamber providing lateral containment of said spring, said spring being positioned in said spring retention chamber between said spring engaging member of said mounting plate and said spring engaging surface of said slide plate." (Emphasis added).

Even if, as the Examiner asserts, that the slide shoulder 70a of Babb could somehow be construed to correspond to Applicant's recited spring retention wall, Babb does not anticipate claim 1 since Babb does not disclose a spring retention chamber established between said spring retention wall of the slide plate and the mounting plate. As noted above, at most slide shoulder 70a of Babb provides vertical containment of the spring in conjunction with the "closed lower end of spring guide 74", but in no way is a spring retention chamber established between slide shoulder 70a of slide plate 70 of Babb and mounting plate (72) of Babb, and in addition, slide shoulder 70a of slide plate 70 of Babb and mounting plate (72) of Babb would not provide lateral containment of the spring, since lateral containment is provided by spring guide 74.

In addition, claim 1 further recites that the spring is positioned in the spring retention chamber (which is established between said spring retention wall of the slide plate and the mounting plate) between the spring engaging member of the mounting plate and the spring engaging surface of the slide plate. Babb simply does not disclose any corresponding structure, with respect to the mounting plate 72 of Babb and the slide plate 70 of Babb, even if, as the Examiner appears to assert, that somehow slide plate 70 and auxiliary drive plate 104 correspond to the slide plate of Applicant's claims (although Applicant contends they do not).

Accordingly, for at least the reasons set forth above, Babb does not disclose, teach or suggest the subject matter of claim 1. Accordingly, claim 1 is believed allowable in its present form.

Claims 2 and 3 are believed allowable due to their dependence, either directly or indirectly, from claim 1. In addition, claims 2 and 3 further and patentably define the present invention over Babb.

Claim 4 is directed to a method for providing an interconnected chassis for a lock set.

Claim 4 recites, among other things, “establishing a spring retention chamber between said spring retention wall of said slide plate and said mounting plate, said spring retention chamber providing lateral containment of a spring, said spring being positioned in said spring retention chamber between said spring engaging member of said mounting plate and said spring engaging surface of said slide plate.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 4 for substantially the same reasons set forth above with respect to claim 1.

Accordingly, claim 4 is believed allowable in its present form.

Claims 5 and 6 are believed allowable due to their dependence, either directly or indirectly, from claim 4. In addition, claims 5 and 6 further and patentably define the present invention over Babb.

Claim 7 is directed to a lock set with an interconnected chassis. Claim 7 recites, among other things, “a slide plate having .... an interior region located between said first cam arm engagement member and said second cam arm engagement member, said interior region of said slide plate having a first spring retention wall and a first spring engaging surface, ...; and a first spring retention chamber established between said first spring retention wall of said slide plate and said mounting plate, said first spring retention chamber providing lateral containment of said first compression spring, said first compression spring being positioned in

said first spring retention chamber between said first spring engaging member of said mounting plate and said first spring engaging surface of said slide plate.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 7 for substantially the same reasons set forth above with respect to claim 1.

In addition, Babb does not disclose, teach or suggest that the interior region of the slide plate has a first spring retention wall and a first spring engaging surface. As shown in Babb Fig. 1B, the slide shoulder 70a of slide plate 70 of Babb which the Examiner contends corresponds to Applicant’s spring retention wall is not in an interior region of slide plate 70, but rather, is in the exterior perimeter of slide plate 70.

Accordingly, claim 7 is believed allowable in its present form.

Claims 8-15 are believed allowable due to their dependence, either directly or indirectly, from claim 7. In addition, claims 8-15 further and patentably define the present invention over Babb.

For example, claim 11 recites, “The lock set of claim 7, said first spring retention wall defining a first elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a first elongated cavity in the slide plate. Nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall in the interior region of the slide plate (see claim 7) that defines an elongated cavity in the slide plate.

Accordingly, claim 11 is believed allowable in its own right.

Claim 12 recites, “The lock set of claim 7, further comprising a second spring engaging member formed at said mounting plate and spaced apart from said first spring

engaging member; a second spring retention wall formed at said slide plate; a second spring engaging surface formed at said slide plate; a second compression spring; and a second spring retention chamber established between said second spring retention wall of said slide plate and said mounting plate, said second spring retention chamber providing lateral containment of said second compression spring, said second compression spring being positioned in said second spring retention chamber between said second spring engaging member of said mounting plate and said second spring engaging surface of said slide plate.” Babb does not disclose the second spring/second spring retention wall/second spring retention chamber arrangement as recited in claim 12 for substantially the same reasons set forth above, that Babb does not disclose, teach or suggest the first spring/first spring retention wall/first spring retention chamber arrangement as set forth in claim 7, with reference to the arguments associated with claim 1.

Accordingly, claim 12 is believed allowable in its own right.

Claim 13 recites, “The lock set of claim 12, said second spring retention wall defining a second elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104 of Babb, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a second elongated cavity in the slide plate. Furthermore, nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall of the slide plate that defines an elongated cavity in the slide plate.

Accordingly, claim 13 is believed allowable in its own right.

Claim 14 recites, “The lock set of claim 7, further comprising: an opening formed through said second cam arm along said second rotational axis; and an operator having a

mounting portion and a split half-round spindle, said mounting portion being positioned in said opening and attached to said second cam arm.” The Examiner identifies spindle 88 of Babb as corresponding to the recited split half-round spindle. However, spindle 88 is a square spindle (see Babb Fig. 3). Babb does not disclose, teach or suggest an operator having a mounting portion and a split half-round spindle, the mounting portion being positioned in the opening and attached to the second cam arm, as recited in claim 14.

Accordingly, claim 14 is believed allowable in its own right.

Claim 15 recites, “The lock set of claim 14, wherein said mounting portion is attached to said second cam arm via a set screw.” In rejecting claim 15, the Examiner relies on Babb column 3, lines 54-65, but the cited passage does not mention attachment via a set screw.

Accordingly, claim 15 is believed allowable in its own right.

Claim 16 is directed to a method for providing a lock set with an interconnected chassis. Claim 16 recites, among other things, “configuring a mounting plate for attachment to a door, ...forming a slide plate having ... an interior region located between said first cam arm engagement member and said second cam arm engagement member, said interior region of said slide plate having a first spring retention wall and a first spring engaging surface;...establishing a first spring retention chamber between said first spring retention wall of said slide plate and said mounting plate, said first spring retention chamber providing lateral containment of a first compression spring; and positioning said first compression spring in said first spring retention chamber, and between said first spring engaging member of said mounting plate and said first spring engaging surface of said slide plate.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 16 for substantially the same reasons set forth above with respect to claim 7, which includes the arguments relating to claim 1. Accordingly, claim 16 is believed allowable in its present form.

Claims 17-24 are believed allowable due to their dependence, either directly or indirectly, from claim 16. In addition, claims 17-24 further and patentably define the present invention over Babb.

For example, claim 20 recites, “ The method of claim 16, said first spring retention wall defining a first elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104 of Babb, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a first elongated cavity in the slide plate. Furthermore, nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall in the interior region of the slide plate (see claim 16) that defines an elongated cavity in the slide plate.

Accordingly, claim 20 is believed allowable in its own right.

Claim 21 recites, “The method of claim 16, further comprising the steps of: forming a second spring engaging member at said mounting plate and spaced apart from said first spring engaging member; forming a second spring retention wall at said slide plate; forming a second spring engaging surface at said slide plate; and establishing a second spring retention chamber between said second spring retention wall of said slide plate and said mounting plate, said second spring retention chamber providing lateral containment of a second compression spring, said second compression spring being positioned in said second spring retention chamber between said second spring engaging member of said mounting plate and said second



spring engaging surface of said slide plate.” Babb does not disclose the second spring/second spring retention wall/second spring retention chamber arrangement as recited in claim 21 for substantially the same reasons set forth above, that Babb does not disclose, teach or suggest the first spring/first spring retention wall/first spring retention chamber arrangement as set forth in claim 16, with reference to the arguments associated with claims 1 and 7.

Accordingly, claim 21 is believed allowable in its own right.

Claim 22 recites, “The method of claim 21, said second spring retention wall defining a second elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104 of Babb, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a second elongated cavity in the slide plate. Furthermore, nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall in the interior region of the slide plate (see claim 16) that defines an elongated cavity in the slide plate.

Accordingly, claim 22 is believed allowable in its own right.

Claim 23 recites, “The method of claim 16, further comprising the steps of: forming an opening in said second cam arm along said second rotational axis; and positioning a mounting portion of an operator having a split half-round spindle in said opening and attaching said mounting portion to said second cam arm.” The Examiner identifies spindle 88 of Babb as corresponding to the recited split half-round spindle. However, spindle 88 is a square spindle (see Babb Fig. 3). Babb does not disclose, teach or suggest an operator having a mounting portion and a split half-round spindle, the mounting portion being positioned in the opening and attached to said second cam arm, as recited in claim 23.

Accordingly, claim 23 is believed allowable in its own right.

Claim 24 recites, “The method of claim 23, wherein said mounting portion is attached to said second cam arm via a set screw.” In rejecting claim 24, the Examiner relies on Babb column 3, lines 54-65, but the cited passage does not mention attachment via a set screw.

Accordingly, claim 24 is believed allowable in its own right.

Claim 25 is directed to an interconnected chassis for a lock set. Claim 25 recites, among other things, “a mounting plate configured for attachment to a door, ...a first compression spring; and a slide plate having ... an interior region between said first end and said second end, ... said interior region of said slide plate having at least a first spring retention housing, said first spring retention housing having a first elongated cavity defined by a first spring retention wall and having a first spring engaging surface, said first elongated cavity of said slide plate cooperating with said mounting plate to define a first spring retention chamber that provides lateral containment and support of said first compression spring, said first compression spring being positioned between said first spring engaging member of said mounting plate and said first spring engaging surface of said slide plate, said first compression spring biasing said second cam arm engagement member of said slide plate into engagement with said second cam arm.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 25 for substantially the same reasons set forth above with respect to claim 7, which includes arguments relating to claim 1.

In addition, Babb does not disclose, teach or suggest “said slide plate having at least a first spring retention housing, said first spring retention housing having a first elongated cavity defined by a first spring retention wall....” While the spring guides 74 of Babb may generally correspond to a “spring retention housing”, the spring guides 74 are not a part of the slide

plate 70 of Babb, as recited in claim 25. Babb discloses at column 4, lines 4-7 that, "Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a and their lower ends abutting against the closed lower ends of spring guides 74." Accordingly, spring guides 74 are necessarily separate from with slide plate 70 so as to provide the intended biasing effect on slide plate 70 (see also Babb Figs. 3 and 7).

Accordingly, claim 25 is believed allowable in its present form.

Claims 26-30 are believed allowable due to their dependence, either directly or indirectly, from claim 25. In addition, claims 26-30 further and patentably define the present invention over Babb.

For example, claim 26 recites, "The interconnected chassis of claim 25, further comprising: said mounting plate including a second spring engaging member horizontally spaced apart from said first spring engaging member; a second compression spring; and said slide plate having a second spring retention housing, said second spring retention housing having a second elongated cavity defined by a second spring retention wall and having a second spring engaging surface, said second elongated cavity of said slide plate cooperating with said mounting plate to define a second spring retention chamber that provides lateral containment and support of said second compression spring, said second compression spring being positioned between said second spring engaging member of said mounting plate and said second spring engaging surface of said slide plate, said first compression spring and said second compression spring biasing said second cam arm engagement member of said slide plate into engagement with said second cam arm."

Babb does not disclose the second spring/second spring retention wall/second spring retention chamber arrangement as recited in claim 26 for substantially the same reasons set forth above, that Babb does not disclose, teach or suggest the first spring/first spring retention wall/first spring retention chamber arrangement as set forth in claim 25, with reference to the arguments associated with claims 1 and 7.

Accordingly, claim 26 is believed allowable in its own right.

Claim 27 recites, "The interconnected chassis of claim 25, further comprising: an opening formed through said second cam arm along said second rotational axis; and an operator having a mounting portion and a split half-round spindle, said mounting portion being positioned in said opening and attached to said second cam arm." The Examiner identifies spindle 88 of Babb as corresponding to the recited split half-round spindle. However, spindle 88 is a square spindle (see Babb Fig. 3). Babb does not disclose, teach or suggest an operator having a mounting portion and a split half-round spindle, the mounting portion being positioned in the opening and attached to the second cam arm, as recited in claim 27.

Accordingly, claim 27 is believed allowable in its own right.

Claim 28 recites, "The interconnected chassis of claim 27, wherein said mounting portion is attached to said second cam arm via a set screw." In rejecting claim 28, the Examiner relies on Babb column 3, lines 54-65, but the cited passage does not mention attachment via a set screw.

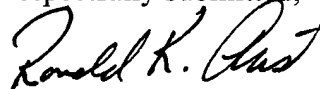
Accordingly, claim 28 is believed allowable in its own right.

For the foregoing reasons, Applicant submits that the present application is in condition for allowance in its present form, and it is respectfully requested that the Examiner so find and issue a Notice of Allowance in due course.

In the event Applicant has overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicant hereby conditionally petitions therefor and authorizes that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

Respectfully submitted,



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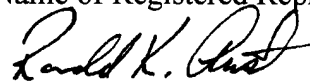
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Signature

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November 24, 2004

Date